

From: Jim Topsale/R3/USEPA/US on 10/30/2006 01:38 PM  
To: Rose Nino/R3/USEPA/US@EPA  
cc: Dave Campbell/R3/USEPA/US@EPA, Chris Pilla/R3/USEPA/US@EPA  
Subject: Re: Fw: DSWA - CIL

Rose,

I offer the following comments:

Title V Permit Renewal Memorandum

1. Tables 2, 3 and 5, page 6 - Revise the Tables and related notes to clarify that the passive flares are needed only for odor control, and accordingly, are State Only Requirements.

2. For the public record, the Memorandum should note that on September 8, 2006 EPA proposed in the Federal Register (71 FR 53272) significant amendments to the landfill NSPS and emission guidelines. The amendments, when promulgated, will clarify what constitutes treated landfill gas (LFG) and who is responsible for compliance activities where multiple parties are involved in the ownership or associated LFG collection, control, and/or treatment systems. Upon EPA's receipt and approval of related amendments to the Delaware landfill 111(d) plan, or promulgation of the amended Federal 111(d) plan, whichever occurs first, a revision of the CIL Title V permit will be required.

Draft Title V Permit

3. Condition 3, Table 1, paragraph b. Emission Unit 2, Twelve Passive Elevated Combustion Flares for Odor Control - Section 1. i. A. Operational Limitations, states, " Each portable passive flare shall be used for temporary installation and operation only as odor control device." [Emphasis added.] Accordingly, the draft permit paragraphs/sections/conditions, relating to emission unit 2, need to be identified as State Only Requirements. Although Condition 3, paragraph g. 3. i., identifies Facility Wide State Only Odor Requirements, there is no reference to the portable passive flare odor requirements of Unit 2.

Did EPA inadvertently approve a Delaware SIP revision that contains an odor requirement for landfills?

Jim T.

Rose Nino/R3/USEPA/US

10/27/2006 11:37 AM

To

Chris Pilla/R3/USEPA/US, Jim Topsale/R3/USEPA/US@EPA

cc

Dave Campbell/R3/USEPA/US@EPA

Subject

Fw: DSWA - CIL

Hi Chris! Sometime back you request that the Permits & Technical Support Branch forward you draft Title V permits on a number of permits. Here is the draft permit from Delaware on Cherry Island Landfill (DSWA).

Hi Jim! Sometime back you request that all Landfill permits come to you for review. So Jim here is another one.

Please provide any comments by November 21, 2006. Thanks

Rose Nino

215-814-3377

Permits & Technical Assessment Branch 3AP11

Air Protection Division

Region III Philadelphia

nino.rose@epa.gov

----- Forwarded by Rose Nino/R3/USEPA/US on 10/27/2006 11:32 AM -----

"Richardson Sandra (DNREC)" <Sandra.Richardson@state.de.us>

10/25/2006 09:46 AM

To

Dave Campbell/R3/USEPA/US@EPA, Rose Nino/R3/USEPA/US@EPA

cc

"Tayeb Shaikh (DNREC)" <Shaikh.Tayeb@state.de.us>, "Terranova Nancy

(DNREC)" <Nancy.Terranova@state.de.us>, "Austin Joanna M. (DNREC)"

<Joanna.Austin@state.de.us>

Subject

FW: DSWA - CIL

Per my previous email, the comments period will end on November 21, 2006.

Sandi Richardson

From: Richardson Sandra (DNREC)  
Sent: Wednesday, October 25, 2006 9:08 AM  
To: 'campbell.dave@epa.gov'; 'nino.rose@epa.gov'  
Cc: Austin Joanna M. (DNREC); Tayeb Shaikh (DNREC); Terranova Nancy (DNREC)  
Subject: DSWA - CIL

Dave and Rose;  
Per Shaikh Tayeb, attached are the files for the "Draft" permit and the Memorandum for DSWA-CIL.

Sandi Richardson

[attachment "06088sat.doc" deleted by Jim Topsale/R3/USEPA/US]  
[attachment "06089sat.doc" deleted by Jim Topsale/R3/USEPA/US]

You may open the document by clicking on this link.